

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,
STATE OF CALIFORNIA,
STATE OF COLORADO,
STATE OF CONNECTICUT,
STATE OF DELAWARE,
THE DISTRICT OF COLUMBIA,
STATE OF FLORIDA,
STATE OF GEORGIA,
STATE OF HAWAII,
STATE OF ILLINOIS,
STATE OF INDIANA,
STATE OF IOWA,
STATE OF LOUISIANA,
STATE OF MARYLAND,
COMMONWEALTH OF MASSACHUSETTS,
STATE OF MICHIGAN,
STATE OF MINNESOTA,
STATE OF MONTANA,
STATE OF NEVADA,
STATE OF NEW JERSEY,
STATE OF NEW MEXICO,
STATE OF NEW YORK,
STATE OF NORTH CAROLINA,
STATE OF OKLAHOMA,
STATE OF RHODE ISLAND,
STATE OF TENNESSEE,
STATE OF TEXAS,
COMMONWEALTH OF VIRGINIA,
STATE OF WASHINGTON, AND
STATE OF WISCONSIN,
ex rel. CHARLES J. WOLF,

Plaintiffs,

v.

MERIT MEDICAL SYSTEMS, INC.,

Defendant.

Hon. Claire C. Cecchi

Civil Action No. 16-01855 (CCC) (MF)

RELATOR'S NOTICE OF DISMISSAL

Relator Charles J. Wolf, M.D. files this notice of dismissal of his remaining claims in this action pursuant to Federal Rule of Civil Procedure 41 (a) (1) based on the following:

1. On November 4, 2020, the United States of America and Relator filed a Notice of Dismissal, which expressly reserved Relator's right to recover reasonable expenses, attorneys' fees, and costs under 31 U.S.C. § 3730(d) and to entitlement under 31 U.S.C. § 3730(d), and State equivalents, to a share of the proceeds of the Medicaid State Settlement Agreements. (ECF 17). The Court signed the Order on November 18, 2020 (ECF 18).
2. The Relator and the Defendant have settled all of the Relator's remaining claims pursuant to a written agreement dated December 28, 2020.
3. Defendant has not filed a responsive pleading or motion for summary judgment.

Dated: January 5, 2021

/s/ Eric Tunis

Law Office of Eric Tunis
53 Cardinal Drive 3D Floor
Westfield, NJ 07090
(O)(908)848-4482
(F)(908)848-4483
Etunis@tunislaw.com
(Local Counsel for Relator)

/s/ Veronica Nannis

Veronica Nannis; vnannis@jgllaw.com
6404 Ivy Lane, Suite 400
Greenbelt, MD 20770
Tel: (301) 220-2200
(Pro Hac Vice Lead Counsel for Relator)